

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ Delta, LLC,
Plaintiff,

v.

CommScope Holding Company, Inc., *et al.*,
Defendants.

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED

FILED UNDER SEAL

DECLARATION OF RUDOLPH FINK IV

I, Rudolph Fink IV, state as follows in support of Plaintiff TQ Delta, LLC's Response to CommScope's Motion to Exclude Portions of the Expert Testimony of Jonathan Putnam and Todor Cooklev Under Fed. R. Evid. 702 and *Daubert*:

1. I am a partner at The Davis Firm, P.C. and counsel of record for TQ Delta, LLC. I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit 01 contains true and correct excerpts of the Expert Report of Stephen L. Becker Ph.D. served in this case and dated November 18, 2022, specifically the title page through the index of exhibits and ¶¶ 323, 343.
3. Exhibit 02 contains true and correct excerpts of the Responsive Expert Report of Dr. Neil Ransom on Non-Infringement of the Family 2, 3, 6, 9A and 9B Patents served in this case and dated November 18, 2022, specifically the title page through the end of the table of contents and ¶¶ 401-405.
4. Exhibit 03 contains true and correct excerpts of the December 8, 2022 Deposition of Dr. Todor Cooklev. Highlighting has been added for cited portions.
5. Exhibit 04 contains true and correct excerpts of the December 6, 2022 Deposition of Dr. Jonathan Putnam. Highlighting has been added for cited portions.
6. Exhibit 05 contains true and correct excerpts of the December 7, 2022 Deposition of Dr. Neil Ransom. Highlighting has been added for cited portions.
7. Exhibit 06 contains true and correct excerpts of the Opening Expert Report of Todor Cooklev, Ph.D served in this case and dated August 29, 2022, specifically the title page

through the end of the table of contents and ¶¶ 3-14; 1332-1364. All highlighting was present in the original.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of January 2023, in Dallas, Texas.

/s/ Rudolph Fink IV
Rudolph Fink IV